

EXHIBIT 1

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ELNORA CARTHAN, et al.,
Plaintiffs,

v.

RICK SNYDER, et al.,
Defendants.

Case No. 5:16-cv-10444-JEL-MKM
Hon. Judith E. Levy

**DECLARATION OF JAMES M. CAMPBELL IN SUPPORT OF
DEFENDANTS VEOLIA NORTH AMERICA, LLC, VEOLIA NORTH
AMERICA, INC., AND VEOLIA WATER NORTH AMERICA
OPERATING SERVICES, LLC'S MOTION TO EXCLUDE THE
OPINIONS AND TESTIMONY OF DR. HOWARD HU**

I, James M. Campbell, declare as follows:

1. I am a partner of the law firm of Campbell Conroy & O'Neil, P.C., and I represent Defendants Veolia North America, LLC, Veolia North America, Inc., and Veolia Water North America Operating Services, LLC (collectively, VNA) in the above-captioned matter. I have personal knowledge of the matters stated in this Declaration.

2. Attached as Exhibit 2 is a true and correct copy of the Declaration of Howard Hu, M.D., M.P.H., Sc.D.

3. Attached as Exhibit 3 is a true and correct copy of the Rebuttal Declaration of Howard Hu, M.D., M.P.H., Sc.D.

4. Attached as Exhibit 4 is a true and correct copy of excerpts of the November 21, 2022 Deposition of Howard Hu, M.D., M.P.H., Sc.D.

5. Attached as Exhibit 5 is a true and correct copy of excerpts of the April 20, 2023 Deposition of Howard Hu, M.D., M.P.H., Sc.D.

6. Attached as Exhibit 6 is a true and correct copy of Ana Navas-Acien, et al., *Lead Exposure and Cardiovascular Disease—A Systematic Review*, 115 Environmental Health Perspectives 472 (2007).

7. Attached as Exhibit 7 is a true and correct copy of the Expert Report of Dr. Brent L. Finley.

8. Attached as Exhibit 8 is a true and correct copy of Kelsey J. Pieper, et al., *Evaluating Water Lead Levels During the Flint Water Crisis*, 52 Environmental Science & Technology 8124 (2018).

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on May 19, 2023
Boston, Massachusetts

/s/ James M. Campbell
James M. Campbell